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Attorneys for WAYMO LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

vs.

UBER TECHNOLOGIES, INC.;  
OTTOMOTTO LLC; OTTO TRUCKING  
LLC,

Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF FELIPE  
CORREDOR IN SUPPORT OF  
DEFENDANTS UBER TECHNOLOGIES,  
INC. AND OTTOMOTTO LLC'S  
ADMINISTRATIVE MOTION TO FILE  
UNDER SEAL THEIR OPPOSITION TO  
WAYMO'S REQUEST TO FILE MOTION  
REGARDING SPOILIATION**

1 I, Felipe Corredor, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to  
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,  
4 LLP, counsel for the Plaintiff Waymo LLC ("Waymo"). I have personal knowledge of the matters set  
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Defendants' Uber Technologies, Inc. and  
7 Ottomotto LLC's Administrative Motion to File Under Seal Their Opposition to Waymo's Request to  
8 File Motion Regarding Spoliation (the "Administrative Motion"). The Administrative Motion seeks  
9 an order sealing highlighted portions of Defendants' Opposition to Waymo's Request to File Motion  
10 Regarding Spoliation ("Uber's Opposition") and of Exhibits 1, 3, and 12 thereto, as well as the  
11 entirety of Exhibits 4-5 and 11 thereto.

12 3. The highlighted or marked portions of Exhibits 4-5 and 12 contain or refer to  
13 confidential business information, which Waymo seeks to seal.

14 4. Exhibit 4 (portions highlighted in green in version filed herewith) and Exhibit 12  
15 (portions marked in red boxes in version filed herewith) contain email addresses of Google and  
16 Waymo employees and/or former employees involved in this case as well as the identity of employees  
17 and/or former employees not directly involved in this case, the disclosure of which would cause  
18 Waymo and those employees substantial harm due to the high public profile of this litigation.

19 5. Exhibit 5 (portions highlighted in green in version filed herewith) contains, references,  
20 and/or describes Waymo's highly confidential and sensitive business information. Such information  
21 includes details regarding Waymo's security measures and protocols. I understand that Waymo  
22 maintains this information as confidential. The public disclosure of this information would cause  
23 significant competitive harm to Waymo, as its security measures would become known to competitors  
24 who could use such information to Waymo's disadvantage.

25 6. Waymo's request to seal is narrowly tailored to those portions of Exhibits 4-5 and 12  
26 that merit sealing.

1 I declare under penalty of perjury under the laws of the State of California and the United  
2 States of America that the foregoing is true and correct, and that this declaration was executed in San  
3 Francisco, California, on October 30, 2017.

4 By /s/ Felipe Corredor

5 Felipe Corredor

6 Attorneys for WAYMO LLC

7  
8 **ATTESTATION**

9 In accordance with Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this  
10 document has been obtained from Felipe Corredor.

11  
12 By: /s/ Charles K. Verhoeven

13 Charles K. Verhoeven